

Ex. C to McCrary Declaration

## THE GARDNER FIRM, P.C.

LAWYERS

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 \_ALSO ADMITTED IN U.S. DISTRICT COURT  
 DISTRICT OF PUERTO RICO  
 ‡ALSO ADMITTED IN DISTRICT OF COLUMBIA

Federal Tax ID # 64-0717201

September 19, 2016

WARN ACT

Invoice # 45472  
 Client No. 6500  
 Matter No. 0125

RE: Infinite Care, Inc. - WARN Act

Previous balance	\$0.00
Payments applied	0.00
Adjustments applied	0.00
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Balance forward	\$0.00
Current Charges	\$127,857.18
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New Balance Due	\$127,857.18

## Professional services

			<u>Hrs</u>	<u>Rate</u>	<u>Amount</u>
04/02/15	MEO	Conference with co-counsel; research Infinite Care; look for info regarding layoffs and/or closing.	2.00	550.00 /hr	1,100.00
04/02/15	MEO	Research additional info regarding layoffs and/or closing.	1.00	550.00 /hr	550.00

WASHINGTON OFFICE:  
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WARN ACT CASES - REFERRED			Invoice# 45472	Page 2
04/06/15	MEO	Review file; conference with co-counsel.	1.50 550.00 /hr	825.00
04/07/15	MEO	Review file; review complaint; conference with co-counsel	1.00 550.00 /hr	550.00
04/10/15	MEO	Follow with co-counsel regarding potential causes of action and strategy in general.	1.00 550.00 /hr	550.00
04/21/15	MEO	Review/revise draft amended complaint.	0.70 550.00 /hr	385.00
04/21/15	MEO	Further research into causes of action.	2.00 550.00 /hr	1,100.00
04/21/15	MEO	Conference with co-counsel; still more research.	1.50 550.00 /hr	825.00
04/23/15	MEO	Review/revise draft amended complaint; conference with co-counsel.	2.00 550.00 /hr	1,100.00
04/30/15	MEO	Conference with co-counsel regarding summons, etc.	0.20 550.00 /hr	110.00
06/03/15	MEO	Conference with co-counsel regarding call from Steven Ludwig who will be appearing and request for time to answer.	0.30 550.00 /hr	165.00
06/03/15	MEO	Telephone call from Steven Ludwig who will be representing defendant and requested extension of time to answer.	0.20 550.00 /hr	110.00
06/04/15	MEO	Receipt and review of Judge's Order regarding need to request default; conference with co-counsel regarding same.	0.20 550.00 /hr	110.00
06/04/15	MEO	Email to Steven Ludwig.	0.10 550.00 /hr	55.00

WARN ACT CASES - REFERRED			Invoice# 45472	Page 3
06/04/15	MVM	Conference with MEO regarding Court's Order entered today.	0.10 500.00 /hr	50.00
06/05/15	MEO	Email to Steven Ludwig regarding Judge's Order wanting us to default defendant.	0.10 550.00 /hr	55.00
06/05/15	MEO	Call with Steven Ludwig regarding Judge's Order regarding default.	0.20 550.00 /hr	110.00
06/05/15	MEO	Conference with co-counsel regarding telephone call with Ludwig and Judge's Order regarding default.	0.30 550.00 /hr	165.00
06/09/15	MEO	Email to co-counsel regarding 4 week extension given to Ludwig to file answer; instructions to Vance McCrary specifically regarding strategies going forward and him to follow up with Ludwig.	0.50 550.00 /hr	275.00
06/10/15	MVM	Email to local counsel regarding electronic filings and NOA by Steven Ludwig.	0.20 500.00 /hr	100.00
06/10/15	MVM	Telephone call with Steven Ludwig.	0.20 500.00 /hr	100.00
06/10/15	MVM	Email to co-counsel regarding service issue.	0.20 500.00 /hr	100.00
07/01/15	MVM	Working on PHV motions.	0.50 500.00 /hr	250.00
07/07/15	MVM	Receipt and review of Defendant's Answer to Plaintiffs' Complaint.	0.30 500.00 /hr	150.00
07/09/15	MVM	Receipt and review of Notice of Appearance by Franz Espanol.	0.10 500.00 /hr	50.00
07/15/15	MVM	Conference with co-counsel regarding upcoming conference with Court.	0.30 500.00 /hr	150.00

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07/16/15	MVM	Receipt and review of initial disclosures from defendant.	0.40 500.00 /hr	200.00
07/17/15	MVM	Conference with defense counsel regarding all issues.	0.40 500.00 /hr	200.00
07/20/15	MVM	Working on Rule 26 Report.	0.80 500.00 /hr	400.00
07/20/15	MVM	Reviewing information given to us by Plaintiffs; review entire file.	1.50 500.00 /hr	750.00
07/21/15	MVM	Emails with plaintiff.	0.30 500.00 /hr	150.00
07/21/15	MVM	Working on Rule 26 Report.	0.30 500.00 /hr	150.00
07/21/15	MVM	Telephone call with Jessica Rodriguez.	0.30 500.00 /hr	150.00
08/01/15	MEO	Conference with MVM regarding discovery strategy.	0.50 550.00 /hr	275.00
08/01/15	MEO	Conference again with MVM about discovery strategy.	0.50 550.00 /hr	275.00
08/01/15	MVM	Work on discovery strategy with Mary Olsen.	0.50 500.00 /hr	250.00
08/02/15	MVM	More discovery strategy with Mary Olsen.	0.50 500.00 /hr	250.00
08/05/15	MVM	Email to Steven Ludwig requesting various categories of info.	0.30 500.00 /hr	150.00
08/05/15	MVM	Receipt and review of Scheduling Order from Court; calendar all items.	0.40 500.00 /hr	200.00
08/10/15	MVM	Working on draft of first interrogatories and requests for production of documents; review file.	5.00 500.00 /hr	2,500.00
08/11/15	MVM	Work on draft discovery requests to defendant.	2.50 500.00 /hr	1,250.00

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08/12/15	MVM	Making final edits to draft discovery to defendant; sending same to defendant.	3.00 500.00 /hr	1,500.00
08/18/15	MEO	Conference with MVM regarding all issues.	0.70 550.00 /hr	385.00
08/18/15	MVM	Conference with co-counsel regarding all issues.	0.70 500.00 /hr	350.00
08/18/15	DCT	Research; email cases to MVM.	2.00 300.00 /hr	600.00
08/19/15	MVM	Email from defense with instructions for call.	0.10 500.00 /hr	50.00
08/20/15	MVM	Call with defense.	0.20 500.00 /hr	100.00
08/21/15	MEO	Conference with MVM about plea agreement.	0.50 550.00 /hr	275.00
08/21/15	MVM	Discuss plea agreement with co-counsel.	0.50 500.00 /hr	250.00
08/21/15	MVM	Receipt and review of plea agreement from criminal proceedings.	0.40 500.00 /hr	200.00
08/25/15	MVM	Telephone calls with former employees.	0.50 500.00 /hr	250.00
09/14/15	MVM	Review file.	3.50 500.00 /hr	1,750.00
09/15/15	MVM	Telephone call with plaintiff.	0.50 500.00 /hr	250.00
09/21/15	MVM	Work on subpoena to Pennsylvania Department of Labor.	0.40 500.00 /hr	200.00
09/21/15	MVM	Email all counsel copying them with subpoena to Pennsylvania Department of Labor.	0.20 500.00 /hr	100.00

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09/22/15	MVM	Receipt and review of email from Deputy Chief Counsel, Rich Lengler, regarding subpoena.	0.20 500.00 /hr	100.00
09/22/15	MVM	Emails back and forth with defense regarding various issues.	0.30 500.00 /hr	150.00
09/23/15	MVM	Emails back and forth with Rich Lengler regarding subpoena.	0.20 500.00 /hr	100.00
09/24/15	MVM	Receipt and review of defendant's responses to plaintiffs; interrogatories and requests for production.	3.50 500.00 /hr	1,750.00
09/24/15	MVM	Further review of defendant's discovery responses.	3.00 500.00 /hr	1,500.00
09/25/15	MVM	Receipt and review of documents from defense.	5.00 500.00 /hr	2,500.00
09/30/15	MVM	Conference call with Neil Mahalingam at Pennsylvania Department of Labor regarding subpoena.	0.40 500.00 /hr	200.00
09/30/15	MVM	Email from Neil Mahalingam regarding inventory log, privileges and follow up meeting; calendaring dates discussed therein.	0.30 500.00 /hr	150.00
09/30/15	MVM	Working on Confidentiality Agreement.	0.50 500.00 /hr	250.00
10/01/15	MVM	Receipt and review of Protective Order.	0.30 500.00 /hr	150.00
10/06/15	MVM	Working on subpoena to Pennsylvania Department of Human Services for documents related to suspension of Medicaid Medical Assistance payments to Infinite Care.	1.00 500.00 /hr	500.00

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10/06/15	MVM	Receipt and review of additional document production from defendant.	2.00 500.00 /hr	1,000.00
10/09/15	MVM	Email to defense regarding additional document production beyond current production.	0.20 500.00 /hr	100.00
10/09/15	MVM	work on subpoena to Pennsylvania Department of Human Services.	0.50 500.00 /hr	250.00
10/09/15	MVM	Email to all counsel regarding subpoena to Department of Human Services.	0.30 500.00 /hr	150.00
10/10/15	MVM	Further review of documents produced by defense to date.	2.00 500.00 /hr	1,000.00
10/13/15	MVM	Email from defense regarding Gary Charnis' emails and roughly 20,000 documents.	0.10 500.00 /hr	50.00
10/14/15	MVM	Email to defense regarding Gary Charnis' emails and documents.	0.10 500.00 /hr	50.00
10/19/15	MVM	Email from defense regarding method of exchange for Gary Charnis' emails and documents.	0.10 500.00 /hr	50.00
10/20/15	MVM	Receipt and review of inventory from Pennsylvania Department of Labor.	0.50 500.00 /hr	250.00
10/22/15	MVM	Email to defense counsel regarding call to Pennsylvania Department of Labor.	0.10 500.00 /hr	50.00
10/22/15	MVM	Email to defense regarding method of exchange for Gary Charnis documents.	0.10 500.00 /hr	50.00
10/22/15	MVM	Email from defense regarding estimated size of Charnis documents.	0.10 500.00 /hr	50.00



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10/22/15	MVM	Email and call to Doug Greene at Legal Imaging regarding size of Charnis documents, hosting, etc.	0.40	500.00 /hr	200.00
10/22/15	MVM	Email from Doug Greene at Legal Imaging regarding Charnis documents, etc.	0.10	500.00 /hr	50.00
10/23/15	MVM	Email from defense regarding call to Pennsylvania Department of Labor.	0.10	500.00 /hr	50.00
10/23/15	MVM	Email to defense regarding database platform we'll be using to host documents, etc.	0.10	500.00 /hr	50.00
10/23/15	MVM	Follow up call with Doug Greene at Legal Imaging regarding additional document production.	0.30	500.00 /hr	150.00
10/26/15	MVM	Email to Neil Mahalingam regarding follow up call to discuss subpoena and their document production.	0.20	500.00 /hr	100.00
10/26/15	MVM	Email from Neil Mahalingam regarding follow up call.	0.10	500.00 /hr	50.00
10/26/15	MVM	Email from defense regarding my request for native files instead of TIFF's.	0.10	500.00 /hr	50.00
10/26/15	MVM	Email to defense regarding native file versus TIFF.	0.10	500.00 /hr	50.00
10/26/15	MVM	Email to and phone call with Doug Greene at Legal imaging regarding native file versus TIFF.	0.30	500.00 /hr	150.00
10/26/15	MVM	Email from Doug Greene at Legal Imaging regarding native file versus TIFF.	0.20	500.00 /hr	100.00

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10/27/15	MVM	Email from defense regarding exchange of additional document production.	0.10 500.00 /hr	50.00
10/27/15	MVM	Email to defense regarding additional custodians beyond Charnis and deposition schedule.	0.10 500.00 /hr	50.00
10/27/15	MVM	Email to Doug Greene at Legal Imaging regarding anticipated additional document production.	0.10 500.00 /hr	50.00
10/28/15	MVM	Emails back and forth with Neil Mahalingam regarding follow up call.	0.20 500.00 /hr	100.00
10/28/15	MVM	Call With neil Mahalingam regarding subpoena to Department.	0.30 500.00 /hr	150.00
10/29/15	MVM	Receipt of link to Charnis emails and roughly 20,000 documents.	0.20 500.00 /hr	100.00
10/30/15	MVM	Emails and phone calls with Doug Greene at Legal Imaging regarding link to new documents.	0.40 500.00 /hr	200.00
11/02/15	MVM	Emails to defense regarding trouble logging on to Kiteworks.	0.20 500.00 /hr	100.00
11/03/15	MVM	Telephone call with defense counsel regarding various discovery issues; email recapping conversation.	0.30 500.00 /hr	150.00
11/04/15	MVM	Email from Doug Greene at Legal Imaging regarding upload of recently produced documents to On Demand.	0.20 500.00 /hr	100.00
11/04/15	MVM	Initial look at docs uploaded to On Demand.	2.00 500.00 /hr	1,000.00
11/04/15	MVM	Emails with defense counsel regarding deposition schedule.	0.30 500.00 /hr	150.00

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11/08/15	MVM	Email to defense counsel regarding deposition schedule.	0.20 500.00 /hr	100.00
11/11/15	MVM	Receipt and initial review of documents responsive to subpoena to Pennsylvania Department of Human Services.	3.50 500.00 /hr	1,750.00
11/11/15	MVM	Email to defense counsel regarding receipt of documents from Department of Human Services.	0.30 500.00 /hr	150.00
11/11/15	MVM	Receipt of boxes of documents and two thumb drives from Pennsylvania Department of Labor in response to my subpoena.	1.00 500.00 /hr	500.00
11/11/15	MVM	Email to defense counsel regarding documents and thumb drives received from Pennsylvania Department of Labor.	0.20 500.00 /hr	100.00
11/11/15	MVM	Further review of documents from Pennsylvania Department of Labor.	1.50 500.00 /hr	750.00
11/12/15	MVM	Continue review of docs produced by Pennsylvania Department of Human Services; begin work on comprehensive timeline and significant events.	2.50 500.00 /hr	1,250.00
11/13/15	MVM	Work on responses to defendant's discovery requests.	1.80 500.00 /hr	900.00
11/16/15	MVM	Continue review of Department of Human Services documents and work on timeline.	3.00 500.00 /hr	1,500.00
11/16/15	MVM	Work on Plaintiff's responses to defendant's discovery requests.	2.00 500.00 /hr	1,000.00

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11/17/15	MVM	Work on responses to defendant's discovery requests; telephone calls with plaintiff; email to plaintiff.	1.50 500.00 /hr	750.00
11/18/15	MVM	Draft letters to plaintiffs.	0.40 500.00 /hr	200.00
11/19/15	MVM	Telephone call with Plaintiff; working on final edits to discovery responses.	1.00 500.00 /hr	500.00
11/23/15	MVM	Review of documents produced by defendant.	4.50 500.00 /hr	2,250.00
11/25/15	MVM	Review documents produced by Pennsylvania Department of Labor.	3.00 500.00 /hr	1,500.00
11/25/15	MVM	Review of documents produced by defendant.	5.50 500.00 /hr	2,750.00
11/27/15	MVM	Receipt and review of documents from Jessica Rodriguez.	0.50 500.00 /hr	250.00
11/27/15	MVM	Telephone call with Jessica Rodriguez.	0.40 500.00 /hr	200.00
11/30/15	MVM	Reviewing documents produced by defendant.	2.00 500.00 /hr	1,000.00
12/01/15	MVM	Working on WARN damage calculation.	3.00 500.00 /hr	1,500.00
12/01/15	MVM	Email to Ashley White regarding defendant's discovery requests.	0.30 500.00 /hr	150.00
12/01/15	MVM	Email from defense.	0.10 500.00 /hr	50.00
12/01/15	MVM	Call with defense.	0.20 500.00 /hr	100.00
12/02/15	MVM	Continue work on WARN damage calculation.	2.00 500.00 /hr	1,000.00
12/02/15	MVM	Review documents produced by defendant.	5.00 500.00 /hr	2,500.00

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12/02/15	MVM	Emails/phone calls with Doug Greene at Legal Imaging about question/issue with hosted documents.	0.40	500.00 /hr	200.00
12/03/15	MVM	Telephone call and emails with Jessica Rodriguez.	0.40	500.00 /hr	200.00
12/03/15	MVM	Email to Ashley White.	0.20	500.00 /hr	100.00
12/03/15	MVM	Review documents produced by defendant.	3.00	500.00 /hr	1,500.00
12/04/15	MVM	Telephone call, email, fax with Jessica Rodriguez.	0.50	500.00 /hr	250.00
12/05/15	MVM	Draft/send letter and email to Ashley White.	0.50	500.00 /hr	250.00
12/08/15	MVM	Email from defense regarding settlement conference.	0.10	500.00 /hr	50.00
12/10/15	MVM	Review of documents produced by Pennsylvania Department of Labor.	2.50	500.00 /hr	1,250.00
12/10/15	MVM	Email to defense regarding settlement conference.	0.10	500.00 /hr	50.00
12/17/15	MVM	Review documents sent to me from former employee.	0.50	500.00 /hr	250.00
12/17/15	MVM	Receipt and review letter to Judge Quinones - Alejandro regarding request to extend deadlines.	0.20	500.00 /hr	100.00
12/21/15	MVM	Email to defense regarding stip to dismiss White and Harris.	0.10	500.00 /hr	50.00
12/21/15	MVM	Receipt and review of email from Judge's Law Clerk regarding request to extend deadlines and need for motion.	0.10	500.00 /hr	50.00

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12/21/15	MVM	Email from defense counsel regarding email from Judge's Law Clerk.	0.10 500.00 /hr	50.00
12/21/15	MVM	Drafting and circulating to other counsel Joint Motion to Extend Deadlines and Proposed Order.	0.50 500.00 /hr	250.00
12/22/15	MVM	Email to Plaintiff regarding settlement conference.	0.10 500.00 /hr	50.00
12/22/15	MVM	Telephone call Plaintiff.	0.20 500.00 /hr	100.00
12/22/15	MVM	Emails from defense counsel regarding Joint Motion to Extend Deadlines.	0.30 500.00 /hr	150.00
12/22/15	MVM	Work on motion to modify scheduling order in light of upcoming mediation.	0.30 500.00 /hr	150.00
12/22/15	MVM	Receipt and review of Revised Scheduling Order from Court.	0.20 500.00 /hr	100.00
01/04/16	MVM	Email with defense counsel.	0.20 500.00 /hr	100.00
01/04/16	MVM	Further review of document production in case.	2.50 500.00 /hr	1,250.00
01/07/16	MVM	Review document production.	4.00 500.00 /hr	2,000.00
01/07/16	MVM	Email to plaintiff.	0.10 500.00 /hr	50.00
01/09/16	MVM	Review document production and outline demand to defense.	5.00 500.00 /hr	2,500.00
01/09/16	MVM	Telephone call with Plaintiff.	0.30 500.00 /hr	150.00
01/11/16	MVM	Review file and documents production and draft demand to defense.	3.00 500.00 /hr	1,500.00
01/12/16	MVM	Conference with co-counsel regarding demand.	0.30 500.00 /hr	150.00

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01/12/16	MVM	Finish demand and send to Steven Ludwig.	2.00 500.00 /hr	1,000.00
01/13/16	MVM	Email to co-counsel regarding case in general.	0.20 500.00 /hr	100.00
01/15/16	MVM	Telephone call with former employee; review documents provided.	0.40 500.00 /hr	200.00
01/19/16	MVM	Conference with co-counsel regarding settlement conference.	0.30 500.00 /hr	150.00
01/21/16	MVM	Working on submission to Judge Hey - reviewing file.	2.00 500.00 /hr	1,000.00
01/22/16	MVM	Review file; finish submission to Judge Hey.	1.50 500.00 /hr	750.00
01/22/16	MVM	Telephone call with Stuart Miller regarding mediation and submission to Judge Hey.	1.50 500.00 /hr	750.00
01/22/16	MVM	Emails back and forth with Plaintiff.	0.40 500.00 /hr	200.00
01/23/16	MVM	Review file and document production in prep for 01/28/16 settlement conference; research various issues.	3.00 500.00 /hr	1,500.00
01/24/16	MVM	Research various issues; review file/documents in preparation for 01/28/16 settlement conference.	2.50 500.00 /hr	1,250.00
01/25/16	MVM	Telephone call with Stuart Miller regarding mediation.	0.50 500.00 /hr	250.00
01/25/16	MVM	Telephone call with Plaintiff.	0.30 500.00 /hr	150.00
01/26/16	MEO	Conference with MVM regarding upcoming mediation.	1.50 550.00 /hr	825.00
01/26/16	MVM	Meet with MEO regarding all issues in preparation for 01/28/16 mediation.	1.50 500.00 /hr	750.00

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01/26/16	MVM	Email with Steven Ludwig regarding settlement conference.	0.10 500.00 /hr	50.00
01/26/16	MVM	Preparation for 01/28/16 mediation.	3.00 500.00 /hr	1,500.00
01/27/16	MVM	Travel to Philadelphia for mediation.	6.00 500.00 /hr	3,000.00
01/27/16	MVM	Meeting with client in preparation for mediation.	1.50 500.00 /hr	750.00
01/28/16	MVM	Receipt and review of email from Steven Ludwig containing agreement between Pennsylvania Department of Labor & Industry and Infinite Care dated 01/27/16.	0.50 500.00 /hr	250.00
01/28/16	MVM	Meet with client; prepare for mediation.	1.50 500.00 /hr	750.00
01/28/16	MVM	In mediation; conference with co-counsel and plaintiff following mediation.	5.00 500.00 /hr	2,500.00
01/28/16	MVM	Travel from Philadelphia from mediation.	5.00 500.00 /hr	2,500.00
01/29/16	MVM	Telephone call and emails with Doug Greene to hibernate the document hosting site in this case.	0.40 500.00 /hr	200.00
02/01/16	MVM	Emails to/from Steven Ludwig.	0.30 500.00 /hr	150.00
02/03/16	MVM	Conference call with Judge Hey and all parties regarding developments since mediation.	0.30 500.00 /hr	150.00
02/10/16	MVM	Emails back and forth with Doug Greene regarding hibernating document hosting site.	0.40 500.00 /hr	200.00
02/16/16	MVM	Working on draft settlement agreement.	4.00 500.00 /hr	2,000.00



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02/17/16	MVM	Making final edits to settlement agreement; email to defense counsel regarding settlement agreement.	1.30 500.00 /hr	650.00
02/17/16	MVM	Working on Motion to Approve Settlement Agreement, Class Notice, Preliminary Approval Order and Final Approval Order.	5.00 500.00 /hr	2,500.00
02/18/16	MVM	working on Joint Motion to Approve Settlement Agreement, Proposed Class Notice, Proposed Preliminary Approval Order and Final Approval Order.	6.00 500.00 /hr	3,000.00
02/19/16	MVM	Working on settlement papers; send same to defense counsel.	2.50 500.00 /hr	1,250.00
02/24/16	MVM	Receipt and review of defense counsel's edits to settlement papers.	1.50 500.00 /hr	750.00
02/25/16	MVM	Further review of defense edits to settlement papers.	1.00 500.00 /hr	500.00
02/29/16	MVM	Review file; prepare for tomorrow phone call with Judge Hey.	0.50 500.00 /hr	250.00
03/01/16	MVM	Follow up call with Judge Hey to discuss progress documenting settlement.	0.20 500.00 /hr	100.00
03/09/16	MVM	Receipt and review of complete list of class members from defense counsel.	0.50 500.00 /hr	250.00
03/11/16	MVM	Email defense counsel regarding list of class members; initial review of list received from defense.	1.00 500.00 /hr	500.00
03/21/16	MVM	Further review of list of class members received from defense. email defense regarding same; set up time to conference.	1.30 500.00 /hr	650.00

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03/23/16	MVM	Emails back and forth with defense counsel regarding list of class members.	0.30 500.00 /hr	150.00
03/24/16	MVM	Emails with defense regarding list of class members.	0.20 500.00 /hr	100.00
03/25/16	MVM	Telephone call with defense counsel regarding list of class members received 03/09/16.	0.30 500.00 /hr	150.00
03/28/16	MVM	Email to defense regarding need to conference and wrap up settlement papers.	0.20 500.00 /hr	100.00
03/29/16	MVM	Call with defense counsel to wrap up items needing attention before filing settlement papers.	0.30 500.00 /hr	150.00
03/29/16	MVM	Receipt and review of email from Judge Hey's law clerk.	0.10 500.00 /hr	50.00
03/29/16	MVM	Working on Exhibit A to the Settlement Agreement.	2.00 500.00 /hr	1,000.00
03/30/16	MVM	Working to make final the full set of settlement papers in an agreed upon form to be filed tomorrow.	4.00 500.00 /hr	2,000.00
03/31/16	MVM	Filing full set of settlement papers.	0.80 500.00 /hr	400.00
04/05/16	MVM	Receipt and review of Order preliminarily approving settlement agreement.	0.30 500.00 /hr	150.00
04/18/16	MVM	Email with defense counsel regarding issue with preliminary approval order which may need to be modified.	0.20 500.00 /hr	100.00
04/18/16	MVM	Working with defense counsel on an Amended Preliminary Approval Order.	0.50 500.00 /hr	250.00

WARN ACT CASES - REFERRED			Invoice# 45472	Page 18
04/18/16	MVM	Letter to Court regarding need for an Amended Preliminary Approval Order.	0.30 500.00 /hr	150.00
04/21/16	MVM	Working on class notice to be mailed out tomorrow to settlement class members.	1.00 500.00 /hr	500.00
04/21/16	MVM	Receipt and review of Amended Preliminary Approval Order entered today.	0.20 500.00 /hr	100.00
04/22/16	MVM	Working to make sure class notices are final and ready to be mailed out.	1.30 500.00 /hr	650.00
04/25/16	MVM	Receipt and review of CAFA notices from defense counsel.	0.40 500.00 /hr	200.00
04/28/16	MVM	Returning calls from class members.	0.30 500.00 /hr	150.00
04/28/16	MVM	Telephone call with Plaintiff.	0.30 500.00 /hr	150.00
04/29/16	MVM	Telephone call with representative of Community Legal Services in Philadelphia calling on behalf of several class members.	0.30 500.00 /hr	150.00
05/02/16	MVM	Receipt of opt-out; note to file.	0.20 500.00 /hr	100.00
05/04/16	MVM	Email from defense counsel regarding class member who called; returned call to class member.	0.30 500.00 /hr	150.00
05/10/16	MVM	Telephone call with class members.	0.50 500.00 /hr	250.00
05/13/16	MVM	Telephone call with class members.	0.70 500.00 /hr	350.00
06/01/16	MVM	Checking status of returned mail, new addresses, re-mailing, etc.	0.70 500.00 /hr	350.00
06/08/16	MVM	Telephone call with class members.	0.50 500.00 /hr	250.00

WARN ACT CASES - REFERRED			Invoice# 45472	Page 19
06/13/16	MVM	Telephone call with class members.	0.50 500.00 /hr	250.00
06/15/16	MVM	Checking status of returned mail, new addresses, re-mailing, etc.	0.50 500.00 /hr	250.00
06/23/16	MVM	Email with defense counsel regarding opt-outs.	0.30 500.00 /hr	150.00
06/30/16	MVM	Email to defense counsel with updated information regarding opt-outs.	0.30 500.00 /hr	150.00
07/12/16	MVM	Telephone call with class members.	0.50 500.00 /hr	250.00
07/20/16	MVM	Email with defense counsel regarding upcoming report due to Court; review draft submission to Court.	0.30 500.00 /hr	150.00
09/06/16	MVM	Begin work on Motion for Final Approval and Motion for Approval of Attorneys Fees and supporting declaration and other papers.	2.50 500.00 /hr	1,250.00
09/07/16	MVM	Continue to work on Motion for Final Approval and Motion for Approval of Attorneys Fees and supporting declaration and other papers.	4.00 500.00 /hr	2,000.00
09/08/16	MVM	More work on Motion for Final Approval and Motion for Approval of Attorneys Fees and supporting declaration and other papers.	5.00 500.00 /hr	2,500.00
09/09/16	MVM	Work on Motion for Final Approval and Motion for Approval of Attorneys Fees and supporting declaration and other papers.	3.00 500.00 /hr	1,500.00
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For professional services rendered			241.90	\$121,475.00

WARN ACT CASES - REFERRED

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## ATTORNEY SUMMARY

<u>Attorney</u>	<u>Hours</u>	<u>Hrly Rate</u>	<u>Amount</u>
Olsen, Mary Elizabeth	18.50	550.00	\$10,175.00
McCrary, M Vance	221.40	500.00	\$110,700.00
Tufts, David C.	2.00	300.00	\$600.00
Additional charges:			
07/01/15 MEO	Clerk, U S District Court - Pennsylvania; Payment for Pro Hac Vice Fee for M. Olsen.		40.00
07/01/15 MVM	Clerk, U S District Court - Pennsylvania; Payment for Pro Hac Vice Fee - M. V. McCrary.		40.00
07/14/15	Federal Express; Federal Express charge for shipment on 07/02/15 to Michael R. Miller, Esq., Philadelphia, PA		23.90
07/21/15	PACER Service Center for copies made during the period of 04/01/15 - 06/30/15.		3.50
07/28/15	Federal Express; Federal Express charge for shipment on 07/17/15 to Eastern District of Pennsylvania.		24.13
08/25/15	Photocopies (22 @ \$0.10 each)		2.20
08/31/15 DCT	Payment to Lexis Nexis for research for invoice #1508007294.		210.59
09/30/15	Photocopies - Pacer Service Center for copies made during the period of 07/01/15 - 09/30/15.		12.10
09/30/15	Photocopies - Pacer Service Center for copies made during the period of 07/01/15 - 09/30/15.		10.30
10/16/15 MVM	Freedom Litigation Support; Payment for service of subpoena to Clint Eisenhower PA Dept. of Human Services.		145.00
12/02/15 MVM	Federal Express; Federal Express charge for shipment on 11/19/15 to Ashley White, Philadelphia, PA.		15.18
12/02/15 MVM	Federal Express; Federal Express charge for shipment on 11/19/15 to LaQuisha Harris, Philadelphia, PA.		15.18

WARN ACT CASES - REFERRED		Invoice# 45472	Page 21
12/31/15		Photocopies - Pacer Service Center for copies made during the period of 10/01/15 - 12/31/15.	5.70
12/31/15		Photocopies - Pacer Service Center for copies made during the period of 10/01/15 - 12/31/15.	1.70
01/07/16	MVM	Paul L Jernigan, CPA; Payment for Professional services for Analysis.	765.00
01/07/16	MVM	Legalimaging, LLC; Payment for Professional services for Hosting/Data Processing.	441.00
01/31/16	MVM	Payment to American Express for flight on Delta Air Lines from Mobile, AL to Atlanta Hartsfield to Philadelphia International to Atlanta Hartsfield to Mobile, AL Departure 01/27/16	864.70
01/31/16		Payment to Lexis Nexis for research for invoice #1601007158.	139.53
02/11/16		Postage (1 Letter @ \$1.42)	1.42
02/11/16		Postage (2 Letters @ \$7.57 each)	15.14
02/11/16		Photocopies (1,188 @ \$0.10 each)	118.80
02/29/16	MVM	Payment to American Express for Travel/Cab Fare with Freedom, Philadelphia, PA on 01/27/16.	36.06
02/29/16	MVM	Payment to American Express for Travel/Lodging @ Hotel Monaco, Philadelphia from 01/27/16 to 01/28/16.	370.24
02/29/16	MVM	Payment to American Express for meal expense @ Phil-D-Jetrock Grill on 01/29/16.	33.19
02/29/16	MVM	Payment to American Express for meal expense @ TGI Fridays, Atlanta, GA on 01/27/16.	21.48
02/29/16	MVM	Payment to American Express for meal expense @ Quizno's, Mobile, AL on 01/27/16.	8.08
02/29/16	MVM	Payment to American Express for meal expense @ Atlanta Airport on 01/28/16.	19.20
02/29/16	MVM	Payment to American Express for Excess Baggage on flight on Delta Air Lines on 01/29/16.	35.00
02/29/16	MVM	Payment to American Express for flight on Delta Air Lines from Philadelphia International to Atlanta Hartsfield to Mobile, AL Departure 01/28/16	340.00

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03/24/16	MVM	Legalimaging, LLC; Payment for Professional services for Hosting Monthly; Hibernated Site Feb/Mar/Apr '16	273.00
03/31/16		Pacer Service Center for copies made during the period of 1/1/16 - 3/31/16.	8.70
05/09/16	MVM	Legalimaging, LLC; Payment for Professional services for Hibernated Site from May - October 2016	300.00
05/09/16	MVM	Federal Express; Federal Express charge for shipment on 04/18/16 to Hon Nitza I. Quinones-Alejand.	25.26
05/31/16		Payment to Lexis Nexis for research for invoice #1605007082.	234.42
07/12/16		Pacer Service Center for copies made during the period of 4/01/16 to 6/30/16.	0.70
07/12/16		Postage (1,589 Letters @ \$0.485 each)	738.89
07/12/16		Envelopes (1,589 @ \$0.20 each)	122.35
07/12/16		Photocopies (9,152 @ \$0.10 each)	915.20
08/25/15		Postage (11 Letters @ \$0.485 each)	5.34
Total costs			<hr/> \$6,382.18
		Professional services	\$121,475.00
		Total costs	\$6,382.18
		Total amount of this bill	<hr/> \$127,857.18
		Previous balance	\$0.00
		Balance due	<hr/> \$127,857.18

Please make all checks payable to The Gardner Firm, P.C.

**LANKENAU & MILLER, LLP**  
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STUART J. MILLER  
 DIRECT DIAL (212) 581-5003  
 sjm@lankmilli.com

September 19, 2016

Re: Infinite Care Inc. -SJM Time

<u>Date</u>	<u>Description</u>	<u>Time</u>
3/24/15	Telephone conference with former employee re: facts surrounding layoffs from nursing home facility. Research re: company status, facility, and single employer issues. Prepare retainer agreement.	1.0
3/25/15	Telephone conference with former employee re: layoffs, potential WARN Act claim, class representation review, emails, notices and other docs relating to Infinite Care.	1.2
3/25/15	Revised Retainer Agreement. Sent to former employee.	0.2
3/26/15	Conduct additional research about the company. T/C with additional employees.	0.3
3/31/15	Received email from Richard Kravets (Infinite Care Management) re; Office Closure letter & the written notice to PA DOL. Spoke to Mary regarding same.	0.2
4/01/15	Review completed Retainer Agreement and questionnaire from L. Harris (class rep).	0.1
4/06/15	Telephone conference with local counsel, Jim Hugget re: conflict check local counsel retainer, and case filing. T/C with client re: same.	0.6
4/06/15	Draft Complaint and edit same. 1.7	
4/07/15	Sent out complaint to Local Counsel to file.	0.1



## LANKENAU &amp; MILLER LLP

4/09/15	Updated class reps that the complaint has been filed.	0.1
4/09/15	T/C with M. Olsen regarding Philadelphia WARN Act.	0.3
4/13/15	Prepare pro hac vice motion and send to local counsel to file.	0.1
4/13/15	Send additional class reps Filed Complaint	0.1
4/13/15	Research regarding company executives for service	0.2
4/17/15	Review email sent to class rep from Infinite Care	0.2
6/3/15	Review email from J. Hugget re: counsel requesting discussion re: Contested service on WARN complaint. T/C w/ Co-counsel re: same.	0.2
6/4/15	T/C w/ co-counsel and defense counsel re: extension of time and facts underlying the case	0.4
6/5/15	Review email from local counsel: re: order of default for Defendants. T/C w/ defense counsel and co-counsel re: same	0.1
6/9/15	Review email from V. McCrary re: four week extension to defense Counsel agreed to. T/C w/ co-counsel re: same.	0.1
6/11/15	Review Order re: approved stipulation allowing defense extension.	0.1
6/23/15	Review email from class rep re: email from Infinite care re: paychecks T/C w/ V. McCrary re: same.	0.2
7/16/15	Review email from M. Olsen re: initial disclosures filed.	0.1
7/21/15	Send copy of Closing Letter to V. McCrary. T/C with him re: same	0.3
8/03/15	Update class rep re: case	0.3
8/14/15	Attempt to contact class rep via email.	0.1
8/17/15	Update to local counsel on A. White.	0.1
10/26/15	Mail pro hac vice papers directly to DE (Mr. Michael Miller) to file	0.1
10/28/15	Update J. Rodriguez on status	0.3
11/18/15	Review email V. McCrary re: letters dropping two plaintiffs	0.1

## LANKENAU &amp; MILLER LLP

12/01/15	Arranged call between V. McCrary and A. White re: update on case	0.1
1/22/16	T/C w/ V. McCrary start preparation for mediation	1.6
1/25/16	T/C w/ V. McCrary RE: issues for mediation	0.6
1/26/16	Preparation for mediation	4.0
1/27/16	Travel to Philadelphia mediation	1.75
1/28/16	Mediation	5.0
1/28/16	Travel from mediation	1.75

**Total: 22**  
**Hourly: \$695**

**SJM Total Time Amount: \$15,290.00**

Costs

Amtrak Philadelphia, PA	\$110.00
Hotel Monaco Philadelphia, PA	\$270.69
Cab, Philadelphia, PA	\$8.57
Cab Philadelphia, PA	\$12.49
Meal expenses Philadelphia, PA	\$21.10
Filing fee	\$400.00
Courier service	\$29.86
Pro hac vice admission fee	\$40.00
Service fee re complaint	\$100
Courier service	\$22.50

LANKENAU & MILLER LLP

**SJM Total Cost Amount: \$1,015.21**

**Total: \$16,305.21**